

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA, for the Use
and Benefit of CECCANTI, INC., a
Washington corporation,

Plaintiffs,

V.

HARTFORD FIRE INSURANCE
COMPANY, a Connecticut corporation,

Defendant.

Case No. 3:22-cv-05103-BHS

**STIPULATED MOTION TO EXTEND
CERTAIN PRE-TRIAL DATES**

**NOTE ON MOTION CALENDAR:
WEDNESDAY, DECEMBER 21, 2022**

I. STIPULATED MOTION

Plaintiff and Defendant (collectively, the “**Parties**”), by and through their respective counsel, stipulate and respectfully request the Court grant an extension of the discovery and dispositive motions deadline in this matter as set forth in the Court’s Order Setting Jury Trial and Pretrial Dates (ECF 13).

Specifically, the Parties request the Court extend these deadlines as follows:

| Event | Current Date | Proposed Revision |
|--|---------------------|--------------------------|
| Discovery completed by | January 3, 2023 | January 31, 2023 |
| All dispositive motions must be filed by | February 1, 2023 | February 15, 2023 |

**STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DATES
[NO. 3:22-cv-05103-BHS] - 1**

SEYFARTH SHAW LLP
Attorneys at Law
999 Third Avenue
Suite 4700
Seattle, WA 98104-4041
(206) 946-4910

1 Good cause exists to grant this limited request to modify certain dates in the Scheduling
2 Order. The Parties recently engaged in Alternative Dispute Resolution and continue to work to see
3 if they can resolve this matter without further litigation. *See, e.g., Rollins v. Traylor Bros Inc.*,
4 2017 WL 2215778, *2 (W.D. Wash. 2017) (Finding good cause to continue trial to allow the
5 parties to complete discovery and to facilitate potential settlement negotiations). A brief extension
6 of the discovery and dispositive motions deadlines will allow the Parties additional time to see if
7 they can resolve their dispute while limiting the attorneys' fees and costs incurred in litigation.
8 The Parties do not request to move any other dates—including the trial date—at this time.

9 DATED: December 22, 2022

10 ASHBAUGH BEAL, LLP

11 By: *s/ Richard H. Skalbania*

12 Richard H. Skalbania, WSBA #17316
13 rskalbania@ashbaughbeal.com
14 James Grossman, WSBA #55843
15 jgrossman@ashbaughbeal.com
701 5th Avenue, Suite 4400
Seattle, WA 98104

16 Attorneys for Plaintiff Ceccanti, Inc.

SEYFARTH SHAW LLP

By: *s/ Ashley J. Sherwood*

Ashley J. Sherwood, WSBA # 46885
asherwood@seyfARTH.com
Ryan M. Gilchrist, WSBA # 50629
rgilchrist@seyfARTH.com
999 Third Avenue, Suite 4700
Seattle, WA 98104

Attorneys for Defendant Hartford Fire
Insurance Company

19 II. **ORDER**

20 IT IS SO ORDERED.

21 DATED this 22nd day of December, 2022.

22
23
24
25
26



BENJAMIN H. SETTLE
United States District Judge

STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DATES
[NO. 3:22-cv-05103-BHS] - 2

SEYFARTH SHAW LLP
Attorneys at Law
999 Third Avenue
Suite 4700
Seattle, WA 98104-4041
(206) 946-4910

1 Presented by:

2 ASHBAUGH BEAL, LLP

3

4 By: s/ Richard H. Skalbania
Richard H. Skalbania, WSBA #17316
rskalbania@ashbaughbeal.com
James Grossman, WSBA #55843
jgrossman@ashbaughbeal.com
701 5th Avenue, Suite 4400
Seattle, WA 98104

5

6 Attorneys for Plaintiff Ceccanti, Inc.

7

8 SEYFARTH SHAW LLP

9 By: s/ Ashley J. Sherwood
Ashley J. Sherwood, WSBA # 46885
asherwood@seyfarth.com
Ryan M. Gilchrist, WSBA # 50629
rgilchrist@seyfarth.com
999 Third Avenue, Suite 4700
Seattle, WA 98104

10

11 Attorneys for Defendant Hartford Fire
12 Insurance Company

13

14 STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DATES
15 [NO. 3:22-cv-05103-BHS] - 3

16

17 SEYFARTH SHAW LLP
18 Attorneys at Law
19 999 Third Avenue
20 Suite 4700
21 Seattle, WA 98104-4041
22 (206) 946-4910

CERTIFICATE OF SERVICE

I hereby certify that on the date below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff:

Richard H. Skalbania, WSBA No. 17316
James Grossman, WSBA No. 55843
Ashbaugh Beal LLP
701 5th Avenue, Suite 4400
Seattle, Washington 98104
Email: rskalbania@ashbaughbeal.com
Email: jgrossman@ashbaughbeal.com
Email: sthomas@ashbaughbeal.com

DATED this 21st day of December, 2022.

s/ Paul B. Mora

Paul B. Mora, Legal Assistant
Seyfarth Shaw LLP
999 Third Avenue, Suite 4700
Seattle, Washington 98104
(206) 946-4910
Email: pmora@seyfarth.com

STIPULATED MOTION TO EXTEND CERTAIN PRE-TRIAL DATES
[NO. 3:22-cv-05103-BHS] - 4

SEYFARTH SHAW LLP
Attorneys at Law
999 Third Avenue
Suite 4700
Seattle, WA 98104-4041
(206) 946-4910